IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

EERIK HEINE, Plaintiff,	)	
v.	)	Civil Action No. 15952
JURI RAUS, Defendant.	)	

AFFIDAVIT

Richard Helms, Deputy Director of Central Intelligence, being first duly sworn, deposes and says that:

1. The purpose of this Affidavit is to specify the information concerning Eerik Heine which was communicated by the Agency to Juri Raus and thus to clarify Paragraph 8 of my previous Affidavit dated April 1, 1966, which I otherwise adopt in its entirety and incorporate herein by reference.

2. Prior to those occasions specified in Paragraphs 5, 6, and 7 of the complaint in this action, the defendant, in a series of conferences, was furnished information by the Central Intelligence Agency to the effect that Eerik Heine was a dispatched Soviet intelligence operative, a KGB agent. The defendant was instructed to warn members of Estonian emigre groups that Eerik Heine was a dispatched Soviet intelligence operative, a KGB agent. The purpose for this instruction was to protect the integrity of the Agency's foreign intelligence

sources, existing within or developed through such groups, in accordance with the Agency's statutory responsibility to collect foreign intelligence and the statutory responsibility of the Director of Central Intelligence to protect foreign intelligence sources and methods. Accordingly, when Juri Raus spoke concerning the plaintiff on the occasions about which complaint is made, he was acting within the scope and course of his employment with the Agency on behalf of the United States.

Richard Helms

STATE OF VIRGINIA)
) ss.
COUNTY OF FAIRFAX)

Subscribed and sworn to before me this 22nd day of April, 1966.

Notary Public

My commission expires 24 [illegible] 1967

(SEAL)